11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1	Thomas A. Connelly (AZ Bar #019430)
2	Robert T. Mills (AZ Bar #018853) Sean A. Woods (AZ Bar #028930)
3	MILLS + WOODS LAW PLLC 5055 North 12th Street, Suite 101
4	Phoenix, Arizona 85014 Telephone 480.999.4556
5	docket@millsandwoods.com
6	DeeAn Gillespie Strub (AZ Bar #009987) GILLESPIE, SHIELDS & TAYLOR
7	7319 North 16th Street
7 8	7319 North 16 th Street Phoenix, Arizona 85020 Telephone: (602) 870-9700
7 8 9	7319 North 16 th Street Phoenix, Arizona 85020 Telephone: (602) 870-9700 Fax: (602) 870-9783 <u>mailroom@gillaw.com</u>
	7319 North 16 th Street Phoenix, Arizona 85020 Telephone: (602) 870-9700 Fax: (602) 870-9783

Jessica Kahraman, et al.,

UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA

Plaintiffs,

v.

State of Arizona, et al.,

Defendants.

PL

SI

U

CONSENT MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT DRUE KAPLAN-

Case No.: 2:22-cv-00375-PHX-SRB

SIEKMAN'S MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LRCiv 7.3(a), the Parties make this consent motion for an enlargement of time for Plaintiffs to file and serve their response to *Defendant Drue Kaplan-Siekman's Motion for Judgment on the Pleadings* [Doc. 154], filed on 28 August 2023. The Parties make this request in good faith and not for purposes of delay.

Plaintiffs' lead counsel's mother passed away unexpectedly in August 2023. Counsel is the executor of her estate, located in Illinois. Unanticipated estate and

Case 2:22-cv-00375-SRB Document 159 Filed 09/11/23 Page 2 of 3

probate issues arose this week, as did some unanticipated scheduling issues in other matters for which counsel is responsible. Consequently, additional time is needed to respond to Defendant Kaplan-Siekman's motion. The parties agree that good cause exists to extend the time for Plaintiffs to respond to Defendant's motion up to and including 18 September 2023.

A proposed Order is also submitted for the Court's consideration.

RESPECTFULLY SUBMITTED this 11th day of September 2023.

MILLS + WOODS LAW PLLC

By <u>/s/Thomas A. Connelly</u>
Thomas A. Connelly
Robert T. Mills
Sean A. Woods
5055 N. 12th St., Ste. 101
Phoenix, AZ 85014

GILLESPIE, SHIELDS & TAYLOR

DeeAn Gillespie Strub 7319 N. 16th St. Phoenix, AZ 85020

Attorneys for Plaintiffs

DOYLE HERNANDEZ MILLAM

By <u>/s/ Brandon D. Millan</u>
William H. Doyle
Brandon D. Millan
1313 E. Osborn Road, Suite 220
Phoenix, AZ 85014

Attorneys for Defendant KaplanSiekman

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2023, I electronically transmitted the foregoing document to be filed electronically with the Clerk's Office through the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be served on all counsel of record via the Court's CM/ECF system.

/s/ Thomas A. Connelly

MILLS + 5055 North Pho Pho 4